

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,	)	Case No. 17-cr-00134 (WMW-DTS)
	)	
Plaintiff,	)	<b>DEFENDANT’S MOTION FOR</b>
	)	<b>DISCLOSURE OF INFORMANTS</b>
v.	)	
	)	
John Kelsey Gammell,	)	
	)	
Defendant.	)	
	)	

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Defendant John Kelsey Gammell, hereby moves the Court for an Order requiring the government to disclose the identity and location of any informant(s) to the defense, including the “internet security researcher” who provided the FBI with the “database dump” of information, and any other informants utilized in any way by the government in the investigation of this case, and further, to either make each informant available for interview by Mr. Gammell’s attorneys in preparation for trial. At a minimum, the government should identify the location and contact information of each informant so that counsel may make their own arrangements to interview each informant.

Further, Mr. Gammell moves the Court for an Order requiring the government to disclose the conduct and methods used by the “internet security researcher” who provided the FBI with vDOS database records, or any other informant who hacked or accessed Mr. Gammell’s accounts, records, personal information, or computer.

Dated: August 18, 2017

By s/Rachel K. Paulose

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